

Memorandum of Agreement

Between the

**Deputy Assistant Secretary
Office of Nuclear Material and Facility Stabilization (EM-60)
Office of Environmental Management
Headquarters, Washington, D.C.**

and

**Director, Office of Quality Assurance (RW-3)
Office of Civilian Radioactive Waste Management
Las Vegas, NV**

for

**Coordination and Implementation of Quality Assurance Activities
Associated with DOE-Owned Spent Nuclear Fuel**

Purpose

This Agreement delineates the coordination and implementation of quality assurance (QA) activities for the National Spent Nuclear Fuel (NSNF) Program between the Office of Nuclear Material and Facility Stabilization (EM-60) and the Office of Quality Assurance (RW-3) associated with preparation of the Department of Energy (DOE)-owned Spent Nuclear Fuel (SNF) for acceptance in an RW-managed, Nuclear Regulatory Commission (NRC)-licensed storage or disposal facility. This Agreement further defines the roles and responsibilities in coordinating and implementing the NSNF QA Program and supersedes the previous Agreement dated July 10, 1996.

Background

Management of DOE-owned spent fuel was realigned in December 1995 under the Office of Nuclear Material and Facility Stabilization (EM-60) as the Office of Spent Fuel Management (EM-67). EM-60 is responsible for overall program policy, guidance, and approval of major policy and budget formulations. In addition, the Headquarters program management functions for

the specific SNF sites were delegated to the Savannah River Office (EM-63) and the Northwestern Office (EM-65). EM-63 and EM-65 are responsible for working with the specific SNF sites on program activities and basic program execution. EM-67 provides overall guidance and direction for managing the NSNF Program.

As a result of the implementation plan for redeployment to field operations, the Idaho National Engineering and Environmental Laboratory (INEEL) was designated as the lead site laboratory for management of DOE-owned SNF, receiving overall program policy and guidance from EM-67. INEEL is responsible for providing coordination and integration of all noncommercial spent nuclear fuel activities for the Department of Energy. The DOE Spent Fuel Program in Idaho is responsible for implementation, and reports to the Director, Office of Spent Fuel Management (EM-67).

The DOE SNF Program Manager, located in DOE Idaho Operations Office, is responsible for implementing and managing cross-cutting, complex-wide spent fuel issues and coordinating with SNF sites. The NSNF Program Manager, acting as deputy to the DOE SNF Manager, coordinates and integrates the implementation of DOE SNF Program policies and guidance regarding the disposal of DOE-owned SNF. The NSNF Program designated an NSNF QA Program Manager (QAPM), located in the DOE Idaho Operations Office, responsible for coordinating the development, implementation, and maintenance of the Program and qualifying the sites' SNF QA programs. To satisfy the organizational and independence requirements of the DOE/RW-0333P, the QAPM reports to the EM-67 Director.

The objectives of the NSNF QA Program are twofold: to obtain RW acceptance of the NSNF QA Program and to qualify/accept the SNF site QA programs. In order to attain these objectives, the NSNF Program committed to complying with the Office of Civilian Radioactive Waste Management (RW) Quality Assurance Requirements and Description (QARD; DOE/RW-0333P).

Although not required by RW, the NSNF Quality Management Plan (QMP) was developed and approved in August 1996. This Plan identifies the programmatic requirements and responsibilities for quality assurance activities required for the management of the NSNF Program. It also describes how the various QA standards, primarily DOE/RW-0333P requirements, are applied, and the transfer of appropriate RW QA and technical requirements to the SNF sites. To implement the QMP, the NSNF Program Management Procedures (PMPs) were developed and approved in August 1996. These procedures specify how applicable QA requirements are accomplished. Concurrently, the NSNF RW Requirements Matrix, which identifies the PMPs that address the DOE/RW-0333P requirements, was submitted and accepted by RW in November 1996. The matrix also facilitated discussion with RW on exceptions to QARD requirements not applicable to the NSNF Program.

Agreement

Formal interface for the NSNF QA Program will be between the EM-67 Director and the RW-3 Director. Routine communications and interfacing activities are between the Deputy Director, RW-3; NSNF Program Manager; and the NSNF QAPM. This interface will provide for coordination of:

- a. Evaluation and acceptance of the NSNF QA Program by RW.
- b. Evaluation and assessment of the SNF sites by the NSNF QAPM.
- c. Review and approval of site-specific QARD Requirements Matrices by NSNF QAPM.
- d. QA activities performed to support the development of DOE-owned SNF technical requirements.
- e. Clarification and interpretation of QA requirements.
- f. Oversight licensing activities of the DOE-owned and NRC-licensed facilities.

The overall goal and objective of this Agreement is to maintain acceptance of the NSNF QA Program by RW, and thereby facilitate acceptance of the SNF sites' QA programs. To maintain acceptance of the NSNF QA Program, RW-3 will:

- a. conduct periodic reviews of the Program
- b. provide Program implementation guidance
- c. assist with coordination efforts to the Nuclear Regulatory Commission (NRC) for disposition of DOE-owned SNF.

These actions, along with ongoing overview/evaluation activities will provide a high degree of confidence that the DOE-owned SNF will meet the established technical requirements for acceptance in an RW-managed, NRC-licensed storage or disposal facility.

Observers

All parties agree that the NRC staff, as well as representatives from affected units of state and local government and Indian tribes, will be permitted, consistent with security access and safety rules, to observe the NSNF QA Program evaluation activities. In addition, the NRC may perform audits of RW and NSNF programs.

Commencement, Amendment, and Termination

This Agreement shall be deemed effective upon signature of the affected parties and shall remain in effect until modified or terminated by mutual agreement or until its provisions are superseded by a comprehensive agreement between EM-60 and RW regarding the NSNF Program for the acceptance and disposal of DOE-owned spent nuclear fuel. This Agreement will be reviewed annually by all parties to assure the conditions described herein are still appropriate to the Agreement.

Signed by David G. Huizenga

D. Huizenga, Acting (Date)
Deputy Assistant Secretary
Office of Nuclear Material and
Facility Stabilization
Office of Environmental Management

Signed by Donald G Horton

Donald G. Horton (Date)
Director, Office of Quality Assurance
Office of Civilian Radioactive
Waste Management